

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

JANE DOE,

Plaintiff,

vs.

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA; and
individuals TAMIKO STRICKMAN and
JOHN ROE, individually and in their
official capacities; and OTHER
UNIDENTIFIED DEFENDANTS;

Defendants.

Case No. 4:21-cv-03049

**JOINT MOTION TO EXTEND
PROGRESSION ORDER DEADLINES**

COME NOW the Plaintiff, Jane Doe, and Defendants Board of Regents of the University of Nebraska and Tamiko Strickman (“Defendants”) by and through their undersigned counsel, and pursuant to the Court’s Civil Case Management Practices, hereby move the Court for an Order enlarging some of the Court’s deadlines issued on September 29, 2022, in its Amended Case Progression Order *[Filing No. 46]* as follows:

1. The deadline for Defendants to identify expert witnesses and completing expert disclosures for all experts expected to testify at trial (both retained experts and non-retained experts) be extended from January 20, 2023, to March 30, 2023.
2. The deadline for completing written discovery under Rules 33, 34, and 36 of the Federal Rules of Civil Procedure be extended from November 29, 2022, to February 15, 2023.
3. The deadline to file any Motions to Compel discovery, written or oral, be extended from December 13, 2022, to March 1, 2023.
4. The deposition deadline be extended from February 28, 2023, to June 15, 2023

5. The deadline for filing Motions to Exclude Testimony on Daubert and related grounds be extended from April 25, 2023 to August 15, 2023.

6. The deadline for filing dispositive motions be extended from April 25, 2023 to August 15, 2023.

7. Change date of planning conference currently set for March 17, 2023 to no sooner than May 15, 2023.

8. The parties are working diligently to comply with all of the Court deadlines. First, BRUN is currently engaged in additional e-discovery: collecting and reviewing for purposes of producing responsive electronic stored information/documents. Second, the Parties are working on scheduling the deposition of Plaintiff, which had to be delayed until written discovery, including production, is completed. Third, the Parties are working on scheduling the deposition of one of the two experts designated by Plaintiff on September 19, 2022 and Defendants are working to discover information with respect to Plaintiffs' experts' opinions. The extension of the above deadlines will allow the parties sufficient time to discover the facts at issue in this case. The enlargement of time requested will not cause any undue hardship or prejudice to any party.

WHEREFORE, Plaintiff and Defendants respectfully request from this Court an extension of the deadlines as set forth herein.

Dated this 14th day of December, 2022.

JANE DOE, Plaintiff.

By: /s/ Karen Truszkowski
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BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA and
TAMIKO STRICKMAN, Defendants.

By: /s/ Lily Amare
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CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case as well as electronically transmitted.

/s/ Lily Amare
Lily Amare

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